

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

CHRISTOPHER MARTIN : **VIOLATIONS:**
QUINTRELL REYNOS : **18 U. S. C. § 1951 (conspiracy to commit**
: **robbery which interferes with interstate**
: **commerce - 1 count)**
: **18 U.S.C. § 1951 (robbery which**
: **interferes with interstate commerce**
: **- 1 count)**
: **18 U.S.C. § 924(c) (use and carrying a**
: **firearm during a crime of violence**
: **- 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**
Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Ed's Pizza House, located at 6047 Ogontz Avenue in Philadelphia, Pennsylvania (the business), was engaged in interstate commerce and was and is in the business of preparing and selling food and beverages to the general public.

2. On or about August 18, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

CHRISTOPHER MARTIN and
QUINTRELL REYNOS

conspired and agreed, together and with others known and unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce, and the

movement of articles and commodities in commerce, in that defendants **MARTIN** and **REYNOS** conspired to unlawfully take and obtain money and other items of value from employees of the business and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and their property, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

3. It was part of this conspiracy that defendants **CHRISTOPHER MARTIN** and **QUINTRELL REYNOS** planned to commit and carried out the armed robbery of Ed's Pizza House, located at 6047 Ogontz Avenue, Philadelphia, Pennsylvania, by using and brandishing firearms at employees of the business to compel compliance with their demands for money and other items of value, including approximately \$750 in cash, a cell phone, and a set of keys.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants **CHRISTOPHER MARTIN** and **QUINTRELL REYNOS** committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about August 18, 2009:

1. Defendants **CHRISTOPHER MARTIN** and **QUINTRELL REYNOS**, went together to Ed's Pizza House, located at 6047 Ogontz Avenue in Philadelphia, Pennsylvania, wearing masks and dark colored clothing. Defendant **REYNOS** was carrying a black Stallard Arms, 9mm semi-automatic pistol, while defendant **MARTIN** was carrying a Ruger rifle, Model #10, .22 caliber with one round in the chamber, bearing serial number 127-

00268.

2. After entering the business, the defendants wore masks and dark colored clothing to disguise their identities, and carrying and brandishing the firearms listed in Overt Act # 1, one of the defendants locked the front door.

3. At gunpoint, defendant **QUINTRELL REYNOS** demanded that employees of Ed's Pizza House give him money and other things of value or he would start shooting.

4. At gunpoint, defendants **CHRISTOPHER MARTIN** and **QUINTRELL REYNOS** stole cash from the store cash register and cash from the employees, as well as a cell phone and a set of keys from a store employee.

5. Defendant **QUINTRELL REYNOS** discharged the Stallard Arms 9mm pistol multiple times near the rear door of Ed's Pizza House and escaped through the rear door of the business.

6. After fleeing from the business, defendant **CHRISTOPHER MARTIN** threw the Ruger rifle he had been carrying onto the ground and continued to flee.

7. As the defendants fled through the rear door of the business, defendant **QUINTRELL REYNOS** discharged a black Stallard Arms 9mm pistol in the direction of a responding Philadelphia Police officer after which the gun jammed. Defendant **REYNOS** then threw the pistol onto the ground and continued to flee.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3, and Overt Acts 1 through 7 of Count One of this indictment are incorporated here.

At all times material to this indictment:

2. On or about August 18, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

CHRISTOPHER MARTIN and QUINTRELL REYNOS

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants **MARTIN** and **REYNOS** unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money from employees of Ed's Pizza House, and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their persons and property in their custody, that is, by pointing a firearm at the employees and demanding money, stealing money and property, and discharging a firearm at a police officer responding to the robbery.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3, and Overt Acts 1 through 7 of Count One of this indictment are incorporated here.
2. On or about August 18, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**CHRISTOPHER MARTIN and
QUINTRELL REYNOS**

knowingly and intentionally used and carried, and aided and abetted the use and carrying of, a firearm, that is: (1) a Stallard Arms 9mm pistol with an obliterated serial number, loaded with two rounds of ammunition double fed in the chamber and two rounds in the magazine; and (2) a Ruger Rifle, Model #10, .22 caliber, with no magazine and one round in the chamber, serial number 127-00268, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit robbery, which interferes with interstate commerce, and robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Sections 1951 and 2.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 924(c)(1), set forth in this indictment, defendants

**CHRISTOPHER MARTIN and
QUINTRELL REYNOS**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offense, that is:

1. one Stallard Arms 9mm pistol with an obliterated serial number;
2. four rounds of ammunition;
3. one Ruger Rifle, Model #10, .22 caliber, serial number 127-00268; and
4. one round of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

MICHAEL L. LEVY
United States Attorney